

PARTIES LISTED ON SIGNATURE PAGE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

TECHNOLOGY PROPERTIES LIMITED )  
and MCM Portfolio LLC, )

Plaintiffs, )

vs. )

CANON, INC., )

Defendant(s). )

Case Number: C 14-03640-CW

**STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED )  
and MCM Portfolio LLC, )

Plaintiffs, )

vs. )

FALCON COMPUTER SYSTEMS, INC., )

Defendant(s). )

Case Number: C 14-03641-CW

**STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED )  
and MCM Portfolio LLC, )

Plaintiffs, )

vs. )

HITI DIGITAL AMERICA INC., )

Defendant(s). )

Case Number: C 14-03642-CW

**STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED  
and MCM Portfolio LLC,

Plaintiffs,

vs.

HEWLETT-PACKARD COMPANY,

Defendant(s).

Case Number: C 14-03643-CW

**STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED  
and MCM Portfolio LLC,

Plaintiffs,

vs.

KINGSTON TECHNOLOGY CO., INC.,

Defendant(s).

Case Number: C 14-03644-CW

**STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED  
and MCM Portfolio LLC,

Plaintiffs,

vs.

NEWEGG INC., et al.,

Defendant(s).

Case Number: C 14-03645-CW

**STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED  
and MCM Portfolio LLC,

Plaintiffs,

vs.

SEIKO EPSON CORPORATION, et al.,

Defendant(s).

Case Number: C 14-03646-CW

**STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED )  
 and MCM Portfolio LLC, )  
 Plaintiffs, )  
 vs. )  
 SHUTTLE COMPUTER GROUP INC., )  
 Defendant(s). )

Case Number: C 14-03647-CW

**STIPULATION FOR ADMINISTRATIVE  
 RELIEF FOR PLAINTIFFS TO FILE  
 ADR CERTIFICATIONS BY PARTIES  
 AND COUNSEL**

Pursuant to Civil Local Rule 7-11, Plaintiffs Technology Properties Limited LLC (“TPL”) and MCM Portfolio LLC (“MCM”) and Defendants Canon Inc., Canon U.S.A., Inc., Falcon Northwest Computer Systems, Inc., HiTi Digital America Inc., Hewlett-Packard Company, Kingston Technology Company, Inc., Newegg Inc., Rosewill Inc., Seiko Epson Corporation, Epson America, Inc. and Shuttle Computer Group Inc. (collectively, “the parties”) respectfully submit this Stipulation for Administrative Relief for Plaintiffs to file the ADR Certifications by Parties and Counsel in the above-captioned matters.

Plaintiffs state as follows in support of this stipulation:

1. Plaintiffs have worked diligently to retain local counsel after this case was transferred to this District.
2. Plaintiffs have not yet been able to retain local counsel. Thus, Plaintiffs have not been able to move the Court for *pro hac vice* admission of its lead counsel.
3. On October 22, 2014 and October 23, 2014, the Court entered Case Management Scheduling Orders in the above-captioned matters.
4. Plaintiffs have served all parties to the above-captioned matter with the Orders.
5. Defendants do not join in Plaintiffs’ statements but do not oppose the relief requested by Plaintiffs.

For these reasons, this stipulation respectfully requests administrative relief for Plaintiffs’ undersigned counsel to file the ADR Certifications by Parties and Counsel (attached hereto as Exhibits A and B).

1  
2 Dated: October 29, 2014

By: /s/ Benjamin R. Askew

3 Anthony G. Simon (*pro hac vice* forthcoming)  
4 Michael P. Kella (*pro hac vice* forthcoming)  
5 Benjamin R. Askew (*pro hac vice* forthcoming)  
6 Timothy D. Krieger (*pro hac vice* forthcoming)  
7 THE SIMON LAW FIRM, P.C.  
8 800 Market Street, Suite 1700  
9 St. Louis, Missouri 63101  
10 P. 314.241.2929  
11 F. 314.241.2029  
12 asimon@simonlawpc.com  
13 mkella@simonlawpc.com  
14 baskew@simonlawpc.com  
15 tkrieger@simonlawpc.com

*Attorneys for Plaintiffs Technology Properties  
Limited, LLC and MCM Portfolio LLC*

16 Dated: October 29, 2014

By: /s/ Tracy A. Stitt (with consent)

17 Jacqueline K. S. Lee (State Bar No. 247705)  
18 jkslee@jonesday.com  
19 JONES DAY  
20 1755 Embarcadero Road  
21 Palo Alto, CA 94303  
22 Telephone: (650) 739-3939  
23 Facsimile: (650) 739-3900

24 Calvin P. Griffith (Admitted *Pro Hac Vice*)  
25 cpgriffith@jonesday.com  
26 David M. Maiorana (Admitted *Pro Hac Vice*)  
27 dmaiorana@jonesday.com  
28 JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, OH 44114  
Telephone: (216) 586-3939  
Facsimile: (216) 579-0212

Tracy A. Stitt (Admitted *Pro Hac Vice*)  
tastitt@jonesday.com

Page 4 of 8

C14-03641-CW, C14-03642-CW, C 14-03643-CW,  
C 14-03644-CW, C 14-03645-CW, C 14-03646-CW,  
C 14-03647-CW

JONES DAY  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001  
Telephone: (202) 879-3939  
Facsimile: (202) 626-1700

*Counsel for Defendants Canon Inc. and Canon  
U.S.A., Inc.*

Dated: October 29, 2014

By: /s/ David S. Hoffman (with consent)

David M. Barkan  
SBN 160825  
FISH & RICHARDSON P.C.  
500 Arguello Street, Suite 500  
Redwood City, California 94070-1526  
Tel: (650) 839-5070  
Fax: (650) 839-5071  
Barkan@fr.com

David M. Hoffman (*admitted pro hac vice*)  
FISH & RICHARDSON P.C.  
One Congress Plaza, Suite 810  
111 Congress Avenue  
Austin, TX 78701  
Tel: (512) 472-5070  
Fax: (512) 320-8935  
Hoffman @fr.com

Christine Yang  
LAW OFFICES OF S.J. CHRISTINE YANG  
17220 Newhope Street, Suite 101-102  
Fountain Valley, CA 92708  
Tel: (714) 641-4022  
Fax: (714) 641-2082  
cyang@sjclawpc.com

*Attorneys for Defendant Kingston Technology  
Company, Inc.*

Dated: October 29, 2014

By: /s/ Gordon M. Fauth, Jr. (with consent)  
Gordon M. Fauth, Jr. (Cal. Bar No. 190280)  
gmf@classlitigation.com

Page 5 of 8

C14-03641-CW, C14-03642-CW, C 14-03643-CW,  
C 14-03644-CW, C 14-03645-CW, C 14-03646-CW,  
C 14-03647-CW

LITIGATION LAW GROUP  
1801 Clement Ave., Suite 101  
Alameda, CA 94501  
Telephone: (510) m238-9610  
Facsimile: (510) 337-1431

Kent E. Baldauf, Jr. (*Pro Hac Vice* admission  
pending)  
kbaldaufjr@webblaw.com  
Bryan P. Clark (*Pro Hac Vice* admission pending)  
bclark@webblaw.com  
THE WEBB LAW FIRM  
420 Ft. Duquesne Blvd, Suite 1200  
Pittsburgh, PA 15222  
Telephone: (412) 471-8815  
Facsimile: (412) 471-4094

*Attorneys for Defendants Falcon Northwest  
Computer Systems, Inc., Newegg Inc. And Rosewill  
Inc.*

Dated: October 29, 2014

By: /s/Andrew T. Oliver (with consent)  
Jenny W. Chen (Cal. Bar No. 205043)  
CHEN IP LAW GROUP  
7F, No. 1, Alley 30, Lane 358, Rueiguang Road  
Neihu District  
Taipei, Taiwan 114  
Telephone: +886.2.7721.8855  
Facsimile: +886.2.7721.8822  
Email: Jenny.Chen@ChenIPLaw.com

Andrew T. Oliver (Cal. Bar No. 226098)  
AMIN, TUROCY & WATSON LLP  
148 Castro Street, Suite B-20  
Mountain View, CA 94041  
Telephone: (650) 618-6477  
Email: aoliver@ATWiplaw.com

*Attorneys for Defendants Shuttle Computer Group  
Inc. and HiTi Digital America, Inc.*

1 Dated: October 29, 2014

By: /s/ Matthew J. Hertko (with consent)

Kyle T. Barrett (State Bar No. 284595)

kbarrett@jonesday.com

JONES DAY

1755 Embarcadero Road

Palo Alto, CA 94303

Telephone: (650) 739-3939

Facsimile: (650) 739-3900

William E. Devitt (admitted *Pro Hac Vice*)

wdevitt@jonesday.com

Matthew J. Hertko (admitted *Pro Hac Vice*)

mhertko@jonesday.com

JONES DAY

77 W. Wacker, Suite 3500

Chicago, IL 60601

Telephone: (312) 782-3939

Facsimile: (312) 782-8585

*Attorneys for Defendants Seiko Epson Corp. and  
Epson America, Inc.*

14 Dated: October 29, 2014

By: /s/ Megan Whyman Olsek (with consent)

Megan Whyman Olesek (SBN 191218)

KENYON & KENYON LLP

1801 Page Mill Road, Suite 210

Palo Alto, CA 94304

Telephone: (650) 384-4700

Facsimile: (650) 384-4701

Email: molesek@kenyon.com

Marcia H. Sundeen (admitted *Pro Hac Vice*)

T. Cy Walker (admitted *Pro Hac Vice*)

KENYON & KENYON LLP

1500 K Street, NW, Suite 700

Washington, DC 20005

Telephone: 202-220-4200

Facsimile: 202-220-4201

Email: msundeen@kenyon.com

Email: cwalker@kenyon.com

*Attorneys for Defendant Hewlett-Packard Company*

Page 7 of 8

C14-03641-CW, C14-03642-CW, C 14-03643-CW,  
C 14-03644-CW, C 14-03645-CW, C 14-03646-CW,  
C 14-03647-CW

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served on all counsel for all parties of record on October 29, 2014 via the Court's CM/ECF system.

/s/ Benjamin R. Askew



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

TECHNOLOGY PROPERTIES LIMITED  
and MCM Portfolio LLC,

Plaintiffs,

vs.

CANON, INC.,

Defendant(s).

Case Number: C 14-03640-CW

**STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED  
and MCM Portfolio LLC,

Plaintiffs,

vs.

FALCON COMPUTER SYSTEMS, INC.,

Defendant(s).

Case Number: C 14-03641-CW

**[PROPOSED] ORDER REGARDING  
STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED  
and MCM Portfolio LLC,

Plaintiffs,

vs.

HITI DIGITAL AMERICA INC.,

Defendant(s).

Case Number: C 14-03642-CW

**[PROPOSED] ORDER REGARDING  
STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED )  
and MCM Portfolio LLC, )

Plaintiffs, )

vs. )

HEWLETT-PACKARD COMPANY, )

Defendant(s). )

Case Number: C 14-03643-CW

**~~[PROPOSED]~~ ORDER REGARDING  
STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED )  
and MCM Portfolio LLC, )

Plaintiffs, )

vs. )

KINGSTON TECHNOLOGY CO., INC., )

Defendant(s). )

Case Number: C 14-03644-CW

**~~[PROPOSED]~~ ORDER REGARDING  
STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED )  
and MCM Portfolio LLC, )

Plaintiffs, )

vs. )

NEWEGG INC., et al., )

Defendant(s). )

Case Number: C 14-03645-CW

**~~[PROPOSED]~~ ORDER REGARDING  
STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

TECHNOLOGY PROPERTIES LIMITED )  
and MCM Portfolio LLC, )

Plaintiffs, )

vs. )

SEIKO EPSON CORPORATION, et al., )

Defendant(s). )

Case Number: C 14-03646-CW

**~~[PROPOSED]~~ ORDER REGARDING  
STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL**

1 TECHNOLOGY PROPERTIES LIMITED )  
and MCM Portfolio LLC, )

2 Plaintiffs, )

3 vs. )

4 SHUTTLE COMPUTER GROUP INC., )

5 Defendant(s) )

Case Number: C 14-03647-CW

~~PROPOSED~~ ORDER REGARDING  
STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE  
ADR CERTIFICATIONS BY PARTIES  
AND COUNSEL

7 Pursuant to the above-referenced Stipulation for Administrative Relief for Plaintiffs to  
8 File ADR Certifications by Parties and Counsel, for good cause shown, IT IS SO ORDERED  
9 that Plaintiffs' lead counsel may file the ADR Certifications by Parties and Counsel.  
10

11 Dated: 10/31/2014

12   
Claudia Wilken

13 UNITED STATES CHIEF DISTRICT JUDGE  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

27 Page 3 of 3

C14-03641-CW, C14-03642-CW, C 14-03643-CW,  
C 14-03644-CW, C 14-03645-CW, C 14-03646-CW,  
C 14-03647-CW

28 ~~PROPOSED~~ ORDER REGARDING STIPULATION FOR ADMINISTRATIVE  
RELIEF FOR PLAINTIFFS TO FILE ADR CERTIFICATIONS BY PARTIES AND COUNSEL

# **EXHIBIT A**

**Plaintiff Technology Properties Limited LLC's  
ADR Certification by Parties and Counsel**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Technology Properties Limited LLC, et al.

Case No. C14-03640 CW

Plaintiff(s),

ADR CERTIFICATION BY PARTIES  
AND COUNSEL

v.

Canon, Inc., et al.

Defendant(s).

Pursuant to Civil L.R. 16-8(b) and ADR L.R. 3-5 (b), each of the undersigned certifies that he or she has:

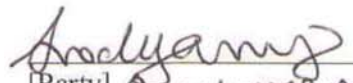
(1) Read the handbook entitled "*Dispute Resolution Procedures in the Northern District of California*" on the Court's ADR Internet site [www.adr.cand.uscourts.gov](http://www.adr.cand.uscourts.gov) (Limited printed copies are available from the clerk's office for parties in cases not subject to the court's Electronic Case Filing program (ECF) under Civil L.R. 5-1(b));

(2) Discussed the available dispute resolution options provided by the Court and private entities; and

(3) Considered whether this case might benefit from any of the available dispute resolution options.

Technology Properties Limited LLC

Dated: October 22, 2014

  
[Party] Anshu Venkides  
Manager

Dated: October 22, 2014

/s/ Benjamin R. Askew  
[Counsel]

When filing this document in ECF, please be sure to use the ADR Docket Event entitled "ADR Certification (ADR L.R. 3-5b) of Discussion of ADR Options."

# **EXHIBIT B**

**Plaintiff MCM Portfolio LLC's ADR  
Certification by Parties and Counsel**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Technology Properties Limited LLC, et al.

Case No. C14-03640 CW

Plaintiff(s),

ADR CERTIFICATION BY PARTIES  
AND COUNSEL

v.

Canon, Inc., et al.

Defendant(s).

Pursuant to Civil L.R. 16-8(b) and ADR L.R. 3-5 (b), each of the undersigned certifies that he or she has:

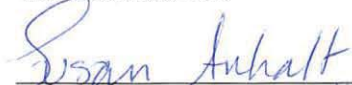
(1) Read the handbook entitled "*Dispute Resolution Procedures in the Northern District of California*" on the Court's ADR Internet site [www.adr.cand.uscourts.gov](http://www.adr.cand.uscourts.gov) (*Limited printed copies are available from the clerk's office for parties in cases not subject to the court's Electronic Case Filing program (ECF) under Civil L.R. 5-1(b)*);

(2) Discussed the available dispute resolution options provided by the Court and private entities; and

(3) Considered whether this case might benefit from any of the available dispute resolution options.

Dated: October 22, 2014

MCM Portfolio LLC

  
[Party] *Susan Anhalt*  
*Manager*

Dated: October 22, 2014

/s/ Benjamin R. Askew  
[Counsel]

When filing this document in ECF, please be sure to use the ADR Docket Event entitled "ADR Certification (ADR L.R. 3-5b) of Discussion of ADR Options."